

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

BKY No. 09-50779

In re:

Dennis E. Hecker,

Debtor.

**MEMORANDUM IN REPLY TO THE DEBTOR'S
OPPOSITION TO TRUSTEE'S MOTION TO
COMPEL SCHEDULE AMENDMENT**

BACKGROUND

On June 4, 2009, Debtor Dennis E. Hecker ("**Debtor**") filed bankruptcy. Schedules were due on June 22, 2009. On June 17, 2009, search warrants were executed on Debtor's homes and business headquarters. On June 22, 2009, the Debtor filed an application to extend the time to file schedules to July 1, 2009. An order was entered extending the time to file schedules.

Over 120 days have passed since this case was commenced. The Debtor has apparently made no effort to review documents which were seized in the execution of the June 17, 2009 search warrants. Seaver Aff.

The Debtor has never filed amended Schedules I and J. The original schedules have "0.00" on every line.

In response to this motion, the Debtor has not provided the Court with any detail of the supposed "efforts" he has made and time he has expended in compiling information to prepare and file truthful schedules.

It does appear, however, that since filing his bankruptcy petition, the Debtor has had time to take vacation trips to Hawaii and Las Vegas. He has also had the time available to attempt to purchase a multi-million dollar home in Kenwood. Affidavit of Randall L. Seaver dated October 6, 2009 ("**Seaver Aff.**") at Ex. A.

For the reasons set forth herein, the Trustee's original motion, and as set forth below, the relief requested by the Trustee should be granted.

1. The Debtor has not exercised any diligence.

Strangely, the Debtor has cited the case of *In re Fauchier*, 71 B.R. 212 (9th Cir. BAP 1987) for the proposition that he only has to use "reasonable diligence" in preparing his schedules. The *Fauchier* case specifically concerned provisions of 11 U.S.C. §523(a)(3) and the statutory language of that section. That case, and that section of the Bankruptcy Code, have no relevance or application to the matter before the Court.

If the Debtor was exercising any diligence, he would have gathered together most of the information needed to file truthful schedules between June 4, the date of filing, and June 17, the date the warrants were executed. After all, his schedules were due on June 22, 2009.

Since the records were seized the Debtor has had over 100 days to review documents and file complete schedules. Yet, he apparently has made no attempt to review records seized in the raids.

In order to have received access to documents seized by authorities, the Debtor would have had to perform the following actions over the past several months:

1. Pick up the telephone and call the Office of the U.S. Attorney at (612) 664-5600.
2. In that conversation with the U.S. Attorney's Office, arrange a time to review documents seized by the authorities.
3. Review and if necessary, request copies of the documents (perhaps cutting short the Hawaii or Las Vegas vacations by a couple of days).

Obviously, the Debtor did not bother to take these simple steps.

Further, other than a general statement to this Court, he has provided the Court with no detail or an accounting of the time he supposedly expended in obtaining and compiling information for the filing of truthful schedules. Instead, the Debtor argues that he could have

worked towards providing truthful schedules “if only” the Trustee had given the Debtor access to records (which the Trustee, through an immense amount of time and expense has obtained). Apparently the Debtor believes that his primary role in this case is to vacation and let the Trustee compile information. Then, if he is ordered to do so by the Court, perhaps expend some time in preparing truthful and complete schedules. The actions of the Debtor evidence a complete and cavalier disregard for his statutory obligations.

Filing truthful schedules and documents does not appear to be a priority for this Debtor. He has presented this Court with no detail to his “efforts” to compile information and prepare truthful schedules in the four months since he filed (or before). His true priorities include known vacation trips to Hawaii and Las Vegas. If he had devoted as much time to reviewing documents, compiling truthful information and amending schedules, as he did on just a fraction of one of his vacations, he would have had complete schedules filed long ago.

Instead, Debtor's strategy appears to be let the Trustee collect information while Debtor enjoys life. Then, it appears, the Debtor intends to simply get information from the Trustee and then, perhaps, amend his schedules.

This Debtor’s behavior and cavalier regard for his obligations is outrageous and cannot be condoned by this Court.

2. The Debtor must truthfully answer Item 10 of the Statement of Financial Affairs.

The Debtor has now told this Court that he has no obligation to disclose transfers made between one and two years before filing so long as the Debtor considers those transfers to be “gifts.”

This argument has no basis. Item 10 of the Statement of Financial Affairs form requires the following:

10. Other transfers.
 - a. List all other property, other than property transferred in the ordinary course of business or financial affairs of the debtor, transferred either absolutely or as security within two years immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include transfers by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.) (Emphasis added.)

The requirement that a Debtor disclose “all other property transferred . . . within two years immediately preceding commencement of this case” requires all Debtors, including Debtor Dennis Hecker to do just that.

Through his false responses to item 10 in both the original and amended statement of financial affairs, the Debtor has effectively concealed hundreds of thousands of dollars of transfers. He should be required, as is every other debtor, to answer this item truthfully.

3. The Debtor has already had over 120 days to file accurate schedules.

The Debtor asserts that the Trustee’s request that he be required to file complete and truthful documents within 5 days of the hearing does not provide him with enough time. This argument ignores the fact that the Debtor has already had since June 4, 2009 to file complete schedules. He has already had far more than enough time to file complete schedules.

CONCLUSION

The Debtor has had over 120 days to prepare truthful and complete schedules. He should be required to file them within five (5) days including, but not limited to, full disclosure under Item 10 of the statement of financial affairs.

**LEONARD, O'BRIEN
SPENCER, GALE & SAYRE, LTD.**

Dated: October 6, 2009

/e/ Matthew R. Burton
By: _____
Matthew R. Burton, #210018
100 South Fifth Street, Suite 2500
Minneapolis, Minnesota 55402
Telephone: (612) 332-1030
Facsimile: (612) 332-2740

ATTORNEYS FOR RANDALL L.
SEAVER, TRUSTEE

410291

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

BKY No. 09-50779

In re:

Dennis E. Hecker,

AFFIDAVIT OF RANDALL L. SEAVER

Debtor.

STATE OF MINNESOTA)
)
COUNTY OF DAKOTA)

Randall L. Seaver, being first duly sworn,

deposes and states as follows:

1. I am the Trustee in the above matter and have knowledge of the facts contained herein.

2. I have been advised by an attorney in the Office of the U.S. Attorney that on the request of the Debtor or his attorney, that office would have made and would now make records seized from the Debtor available to him for review. I have also been advised that no such request has been made.

3. Christi Rowan recently produced some records in response to a Rule 2004 Subpoena. Attached as Exhibits A are true and correct copies (with redaction if appropriate) of documents provided by Ms. Rowan bearing control numbers Rowan 0027, 40, 41, 54, 56, 57 and 69.

4. Attached hereto as Exhibit B is a true and correct copy (with redaction where appropriate) of a statement produced by TCF for a TCF account for New Dimension Advisors, LLC for the time period ending 8/31/09. I believe that New Dimension Advisors, LLC is a business entity used by the Debtor for post-petition activities.

5. Attached hereto as Exhibit C are true and correct copies of the Debtor's original B(7) and the supplemental B(7). After the complaint in ADV No. 09-5020 was filed, the Debtor turned additional unscheduled watches over to me. Those watches are itemized at the Debtor's

Supplemental Schedule B(7) filed on September 1, 2009. I have met with a representative from AAA Watches and he has inspected watches turned over by the Debtor. It was estimated by that individual that the value of Rolex and other watches not originally scheduled by the Debtor, but turned over to the Trustee after commencement of ADV No. 09-5020, which watches are itemized at Supplemental Schedule B(7), filed by the Debtor on September 1, 2009, have a total value of in the tens of thousands of dollars. On July 13, ADV No. 09-5020 was commenced by me against the Debtor, seeking, among other things, the turnover of unscheduled watches. I request that the court take judicial notice of that complaint.

6. Attached hereto as Exhibit D is a true and correct copy of one page of a "transaction detail account" report was provided to me by Mr. Hecker's attorneys. It is my understanding that this report relates to transactions by Mr. Hecker. I have underlined apparent payments to the Mathiesens and the apparent payment for the purchase of a 2008 Harley Davidson motorcycle.

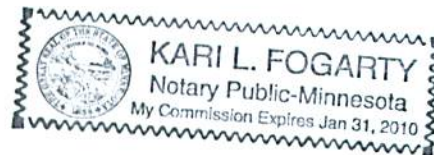
7. Attached hereto as Exhibit E is a true and correct copy of a document entitled "Lease Agreement" provided to me by Steve Mathiesen.

FURTHER YOUR AFFIANT SAYETH NOT.


Randall L. Seaver

Subscribed and sworn to before me
this 6 day of October, 2009.


Notary Public



From: heckerauto@
Subject: Important
Date: August 26, 2009 7:07:51 AM CDT
To: Eric Redlinger
Cc: Christi Rowan
Reply-To: heckerauto@aol.com

Eric make this last and final offer. 2.4 purchase price c/d for 2 years int at 6 percent
200k down at closing
100k in 12 months
Bal in 24 months

Or
100k down rent for 2years purchase price 2.4 any time during 24 months for all cash. If don't exercise purchase they keep 100k

Its my intention to spend 100k this fall painting land scape pool and window treatments etc.

I can do the 2nd tomorrow.

Thanks denny
200k down
Sent via BlackBerry by AT&T

EXHIBIT A

ROWAN0027

From: [REDACTED]
Subject: Re: Arrive
Date: August 20, 2009 1:53:06 PM CDT
To: Ms <mshulman@mirage.com>
Cc: Christi Rowan <[REDACTED]>
Reply-To: hecker <[REDACTED]>

Matt I am sorry. We arrive Fri at 430 I am all screwed up on my times. Everything else the same. Thanks. Denny
Sent via BlackBerry by AT&T

-----Original Message-----

From: "Shulman, Matt" <mshulman@mirage.com>

Date: Thu, 20 Aug 2009 08:47:53

To: [REDACTED]

Subject: Re: Arrive

??????

----- Original Message -----

From: hecker <[REDACTED]>

To: Shulman, Matt

Sent: Thu Aug 20 08:46:21 2009

Subject: Re: Arrive

Matt good morning
Sent via BlackBerry by AT&T

-----Original Message-----

From: "Shulman, Matt" <mshulman@mirage.com>

Date: Wed, 19 Aug 2009 13:06:32

To: <HECKERA@[REDACTED]>

Subject: Arrive

Thur or Fri? Tail #

From: heckera [REDACTED]
Subject: Fw: Dolphins
Date: August 19, 2009 11:42:21 AM CDT
To: Christi Rowan <[REDACTED]>
Reply-To: heckerauto@aol.com

Sent via BlackBerry by AT&T

-----Original Message-----

From: heckera [REDACTED]
Date: Wed, 19 Aug 2009 16:42:09
To: Ms<mshulman@mirage.com>
Subject: Re: Dolphins

[REDACTED] christi 35. Thanks a Lani? I got \$\$\$\$ 4 _u. 630 PM
Sent via BlackBerry by AT&T

-----Original Message-----

From: "Shulman, Matt" <mshulman@mirage.com>

Date: Wed, 19 Aug 2009 09:15:51
To: <HECKERA [REDACTED]>
Subject: Dolphins

Need name and specific ages of kids for dolphins. Eta thur?

ROWAN0041

From: heckerauto[REDACTED]
Date: August 3, 2009 10:31:27 PM CDT
To: Jessica 11Robb [REDACTED]
Reply-To: heckerauto[REDACTED]

Jessica,

The items that you were given by myself from June 2007 - 2009 have been given to the trustee. By the request of my attorneys by the trustee, it's best that all are returned ASAP.
When the items are ready for pick up I will send a courier to retrieve them.
As you are aware of the abusive publicity and negative recourse
Of the BK, this may keep you out of being subject to the media frenzy.

Sent via BlackBerry by AT&T

ROWAN0054

Redacted

The following flights are confirmed:

Date: Tuesday, August 4

Flight: NW 624

Departs: Honolulu-Int'l, HI (HNL) at 5:15PM

Check in on August 3

Arrives: Minneapolis/St. Paul-Int'l, MN (MSP) at 6:05AM on Wednesday, August 5

Class of Service: First Class(P)

Seat: 06-A, 06-B, 06-C

Flight Duration: 7 hours 50 minutes

Approximate Miles: 3,967

Meal Service: Dinner

Aircraft: Airbus A330

Note: Operated by Northwest Airlines

Note: Check in with Northwest / Delta Air Lines

The following E-Tickets have been issued:

Passenger Name:HECKER/DENNIS.E

Receipt Information for your E-Ticket Number(s):0122176830964

E-Ticket Issue Date: March 02, 2009

Flight	Origin-Destination	Date	Fare Basis Code	Status
NW 0221	MSP-HNL	28Mar2009	<u>F7R9N</u>	Exchanged
NW 4994	HNL-OGG	28Mar2009	<u>F7R9N</u>	Exchanged
NW 9295	OGG-SLC	04Apr2009	<u>F7R9N</u>	Exchanged
NW 1026	SLC-MSP	05Apr2009	<u>F7R9N</u>	Exchanged

Base Fare: USD2073.42

Tax: 23.50

Tax: 78.62 **Tax:** 18.00

Fare includes fuel surcharge if applicable.

E-Ticket Total:USD2193.54

Method of Payment: American Express *****7006

Fare Calculation: 7 MSP NW X/HNL Q100.00NW OGG 936.71NW X/SLC Q100.00NW MSP 936.71USD2073.42END NW ZPMSPSFOHNLGGSLC XT10.00AY 13.50XF MSP4.5OGG4.5SLC4.5

Other Restrictions: NON-REFUNDABLE

Name/Place of Issue: NWA.COM US E-TICKET TAR MPLS/ST PAUL MN/

Passenger Name:HECKER/DENNIS.E

Receipt Information for your E-Ticket Number(s):0122180771353

E-Ticket Issue Date: June 07, 2009

Flight	Origin-Destination	Date	Fare Basis Code	Status
NW 0625	MSP-HNL	09Jul2009	<u>YR0ZUPNQ</u>	Exchanged
NW 0624	HNL-MSP	18Jul2009	<u>YR0ZUPNQ</u>	Exchanged

Base Fare: USD2182.10

Tax: 14.00

Tax: 81.90 **Tax:** 7.20

Fare includes fuel surcharge if applicable.

E-Ticket Total:USD2285.20

Additional amount collected during ticket exchange:USD241.66

Method of Payment: Visa*****6633

Fare Calculation: MSP NW HNL1091.05NW MSP1091.05USD2182.10END NW ZPMSPHNL XT 5.00AY9.00XF MSP4.5HNL4.5

Other Restrictions: NON-REFUNDABLE

Name/Place of Issue: NWA.COM US E-TICKET TAR MPLS/ST PAUL MN/

Passenger Name:HECKER/DENNIS.E

ROWAN0056

Receipt Information for your E-Ticket Number(s):0122182506275

E-Ticket Issue Date: July 24, 2009

Flight	Origin-Destination	Date	Fare Basis Code	Status
NW 0625	MSP-HNL	29Jul2009	<u>YA00UPRQ</u>	Flown
NW 0624	HNL-MSP	06Aug2009	<u>YA00UPRQ</u>	Exchanged

Base Fare: USD2409.24

Tax: 14.00

Tax: 88.76 Tax: 7.20

Fare includes fuel surcharge if applicable.

E-Ticket Total:USD2519.20

Additional amount collected during ticket exchange:USD384.00

Method of Payment: American Express *****1032

Fare Calculation: MSP NW HNL1204.62NW MSP1204.62USD2409.24END NW ZPMSPHNL XT
5.00AY9.00XF MSP4.5HNL4.5

Other Restrictions: NON-REFUNDABLE 2285.20 USD

Name/Place of Issue: NWA.COM US E-TICKET TAR MPLS/ST PAUL MN/

Passenger Name:HECKER/DENNIS.E

Receipt Information for your E-Ticket Number(s):0122182778636

E-Ticket Issue Date: July 31, 2009

Flight	Origin-Destination	Date	Fare Basis Code	Status
NW 0624	HNL-MSP	03Aug2009	<u>P0</u>	Exchanged

Base Fare: USD2551.93

Tax: 14.00

Tax: 93.07 Tax: 7.20

Fare includes fuel surcharge if applicable.

E-Ticket Total:USD2666.20

Additional amount collected during ticket exchange:USD147.00

Method of Payment: Visa*****4986

Fare Calculation: MSP NW HNL1204.62NW MSP1347.31USD2551.93END NW ZPMSPHNL XT
5.00AY9.00XF MSP4.5HNL4.5

Other Restrictions:

Name/Place of Issue: NWA.COM US E-TICKET TAR MPLS/ST PAUL MN/

Passenger Name:HECKER/DENNIS.E

Receipt Information for your E-Ticket Number(s):0122182849956

E-Ticket Issue Date: August 04, 2009

Flight	Origin-Destination	Date	Fare Basis Code	Status
NW 0624	HNL-MSP	04Aug2009	<u>P0</u>	Available

Base Fare: USD2551.93

Tax: 93.07

Tax: 5.00 Tax: 16.20

Fare includes fuel surcharge if applicable.

E-Ticket Total:USD2666.20

Method of Payment: Visa*****4986

Document(s) Used during E-Ticket Issue: 0122182778636 Document(s) value total: USD2666.20

Fare Calculation: MSP NW HNL 1204.62 NW MSP 1347.31 USD2551.93END NW ZPMSPHNL XT 7.20ZP
9.00XF MSP4.5HNL4.5

Other Restrictions:

Name/Place of Issue: NWA TICKETING CENTER SINGAPORE/

Redacted

From: heckerauto@aol.com
Subject: Fw:
Date: July 29, 2009 10:13:51 AM CDT
To: Christi Rowan [REDACTED]
Reply-To: heckerauto@aol.com

Sent via BlackBerry by AT&T

From: "Susan A. Miller"
Date: Wed, 29 Jul 2009 07:47:03 -0500
To: Denny Hecker [REDACTED]
Subject:

Sturgis:

Your rental unit with the Mathisens starts July 30th thru August 9th.

IMPORTANT NOTICE: This e-mail message is intended to be received only by persons entitled to receive the confidential information it may contain. E-mail messages to clients of the Denny Hecker Automotive Group may contain information that is confidential and legally privileged. Please do not read, copy, forward, or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it to the sender and delete it completely from your computer system.

ROWAN0069

TCF NATIONAL BANK
801 MARQUETTE AVE
MINNEAPOLIS MN 55402



Page 1
STATEMENT DATE
08-31-09

S T A T E M E N T

7532
8

NEW DIMENSION ADVISORS LLC
500 FORD RD
MINNEAPOLIS MN 55426-1062

REFER YOUR FRIENDS TO TCF AND GET
REWARDED! \$25 FREE FOR YOU, \$50 FREE
FOR YOUR FRIENDS. PICK UP YOUR FORMS
AT ANY TCF BANK OR PRINT THEM ONLINE
AT WWW.TCFBANK.COM. OFFER SUBJECT
TO LIMITATIONS AND REQUIREMENTS. SEE
A TCF REPRESENTATIVE FOR DETAILS.

FOR INFORMATION CALL GREG DREHMEL

612-661-8349

PAYING WITH YOUR TCF CHECK CARD IS EASY AND SAFE. TO MAKE EVERYDAY PURCHASES, SIMPLY PRESENT YOUR
CARD AT PARTICIPATING RETAILERS, SELECT CREDIT, AND SIGN! IF YOU HAVE NOT ALREADY ACTIVATED YOUR
CHECK CARD, CALL 1-800-823-0919. MEMBER FDIC.

FREE SMALL BUSINESS CHECKING

STATEMENT PERIOD 08-01-09 THROUGH 08-31-09

ACCOUNT NUMBER	7532			
ACCOUNT SUMMARY	BALANCE 07-31-09	CHECKS/WITHDRAWALS	DEPOSITS/ADDITIONS	BALANCE 08-31-09
	31,569.40	53,339.76	36,063.36	14,293.00

AS OF 08/25/2009, YOUR TCF MILES PLUS BUSINESS REWARDS POINT TOTAL WAS 2,078.
TO REDEEM OR TO ACCESS YOUR MOST RECENT
TCF MILES PLUS BUSINESS REWARDS POINT TOTAL, PLEASE SIGN IN TO
ONLINE BANKING AT WWW.TCFBANK.COM AND CLICK ON THE REWARDS TAB.

CHECKS PAID

CHECK NUMBER	DATE PAID	REF NUMBER	CHECK NUMBER	DATE PAID	REF NUMBER	CHECK NUMBER	DATE PAID	REF NUMBER
101	717.00	0831	81169151	1008	5,300.00	0818	82134200	1011
* 1005	3,000.00	0807	25018107	1009	231.44	0819	83011622	1012
1006	750.00	0810	81266383	1010	5,690.00	0826	83031632	* 1014
1007	1,500.00	0811	82133849					

* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

OTHER WITHDRAWALS AND CHARGES

DATE	AMOUNT	DESCRIPTION	DATE	AMOUNT	DESCRIPTION
0814	12,000.00	WITHDRAWAL-WIRE TRANSFER	0826	5,000.00	MIRAGE HOTEL & CAS
0814	25.00	WIRE TRANSFER FEE			LAS VEGAS NV
0824	2,078.49	SCOOP LAS VEGAS IN	0827	70.00	UNAVL FDS FEE-ITEM NT PD
		LAS VEGAS NV	0827	35.00	NSF FEE-ITEM PAID
0825	357.83	J CREW #584	0831	15.00	WIRE TRANSFER FEE
		LAS VEGAS NV	0831	70.00	STOP PAYMENT FEE

DEPOSITS AND OTHER ADDITIONS

DATE	AMOUNT	DESCRIPTION	DATE	AMOUNT	DESCRIPTION
0812	5,073.36	DEPOSIT REF # 23055450	0827	5,690.00	RETURNED CHECK # 1010
0826	7,500.00	DEPOSIT REF # 23033971	0828	500.00	DEPOSIT REF # 25054123
0827	9,800.00	RETURNED CHECK # 1014	0831	7,500.00	DEPOSIT-WIRE TRANSFER

FOR BALANCE, CHECKS PAID INFORMATION, FUNDS TRANSFER, DEPOSIT VERIFICATION, OR OTHER CUSTOMER SERVICE
QUESTIONS, VISIT US ONLINE AT TCFBANK.COM, OR CALL: 612-TCF-BANK (612-823-2265). TOLL FREE AT
1-800-823-2265. TDD 612-339-3075. THANK YOU FOR BANKING WITH TCF. NSF/OVERDRAFT FEE IS \$35.

www.tcfbank.com

EXHIBIT B

T0000003

Watches	Band	Make	Model	Misc.	Lot Value
yellow 18k	18K Gold	Rolex	Day Date		\$22,400
yellow 18k	18K Gold	Rolex	Daytona		
yellow 18k	18K Gold	Rolex	Submariner		
yellow 18k	Leather	Rolex Cellini	Cellini		
Stainless	Leather	Tudor	Tiger Woods		
*Stainless	Stainless	Yahtmaster	Rolex		
Stainless	Leather black	Breitling	Chrono	lookalike	\$750
Stainless	Stainless	Breitling	Colt Superdean		
*Stainless	Navy Rubber	Breitling	Chrono	lookalike	
Stainless	Rubber	Hublot	Big Bang	lookalike	\$8,750
Stainless	Leather	Corum	Joker		
Stainless	Leather	Baume Mercier	Tank		
*Rose Gold	Chocolate Rubber	Hublot	Big Bang		
Stainless	Rubber	Panerai	Luminor	lookalike	\$2,500
Stainless	Leather	Panerai	Luminor		
Stainless	Stainless	Montblanc	GMT		
Stainless	Stainless	Montblanc	Chrono		
Goldplate	Leather	Montblanc	Chrono		
Stainless	Leather	Euro Watch Co.	Ganador		\$300
Stainless	Leather	Officin a del tempo	#A26361		
Stainless	Leather	Damiani	Tank		
Stainless	Leather	Versace	Chrono		
Stainless	Stainless	Versace			
Stainless	Both	Kobold	Automatic		\$150
Stainless	Both	Kobold	Automatic		
BLK Stainless	Rubber	Momo	Chrono		
Stainless	Leather	Chevy logo			
Stainless	Rubber	Empirio Armani			
Stainless	Yellow Rubber	Techno Marine			\$250
Stainless	Blue Rubber	Techno Marine			
Stainless	Black Rubber	Swiss Army			
Stainless	Stainless	Swiss Army			
Stainless	Stainless	Swiss Army			
Stainless	Leather	Grimoldi	Borgonvo		\$100
Stainless	Nylon	Nixon	Square		
*Stainless	Rubber	Tommy Bahama			
Stainless	Stainless	Tommy Hilfiger			
Stainless	Nylon	Tommy Bahama			
?			Cartier	Travel Clock	\$90
18k	Ring		N/A	Wedding band	\$24,000

EXHIBIT C

Document Page 10 of 40
Hecker - Supplemental Exhibit B(7)

Watches	Band	Make	Model	Misc.	Lot Value
Stainless	Stainless	Breitling			
Silver	Black leather	Breitling			
Black		Bulgari		Lookalike	
	Orange	Lockman			
	Leather	Panerai			
		Panerai	Luminor Marina		
	Brown leather	Panerai	Luminor		
	Red	Porsche			
Black face with gold trim	Gold	Rolex	Submariner		
Blue face with gold trim	Stainless	Rolex	Submariner		
Gold	Gold	Rolex	Yachtmaster		
Gold	Gold	Rolex	Daytona		
Platinum	Platinum	Rolex	Day/Date		
Black face with stainless trim	Black leather	Tudor	Tiger		

Page 2 of 2

EXHIBIT D

LEASE AGREEMENT

LEASEE

DENNY HECKER
500 FORD ROAD
MINNEAPOLIS, MN 55426
612 850 1254/763 493 2093 fax

LEASOR

STEVE AND JULIE MATHIESEN
612 WEBER DR.
STURGIS, SD 57785

RENTAL FEE

\$8000.00
\$ 500.00 Discount
\$7500.00 TOTAL RENTAL FEE
\$1000.00 Non-refundable deposit due Nov 24, 2008
\$6500.00 rental balance due by January 1, 2009

LENGTH OF STAY

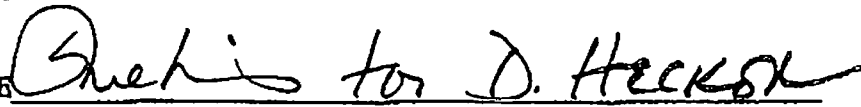
THURSDAY JULY 30, 2009 NOON THROUGH
SUNDAY AUGUST 9, 2009 NOON

OCCUPANCY

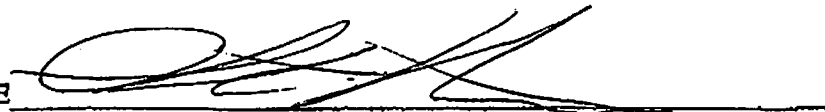
8 PERSONS MAXIMUM. NO PARTIES. NO PETS.
OCCUPANTS WILL ABIDE BY DIRECTIONS/
REQUESTS ASSOCIATED WITH LIMITATIONS
OF PROPERTY/UTILITIES.

NON-SMOKING. NO SUBLEASING ALLOWED. LEASEE WILL BE LIABLE FOR DAMAGES UNDER CONDITIONS OF LEASE. NO TENTS OR CAMPERS. THE OCCUPANTS OF STATED PROPERTY WILL ADHERE TO THE LAWS AND ORDINANCES OF THE STATE OF SOUTH DAKOTA, MEADE COUNTY AND THE CITY OF STURGIS. NOT RESPONSIBLE FOR INJURIES, ACCIDENTS OR NEGLIGENCE.

LEASEE
SIGNATURE



LESSOR
SIGNATURE



EMERGENCY/LOCAL CONTACT PERSON TO BE DETERMINED.

EXHIBIT E

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

BKY No. 09-50779

In re:

Chapter 7

Dennis E. Hecker,

Debtor.

UNSWORN CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2009, I caused the following documents:

***Memorandum in Reply to the Debtor's Opposition to Trustee's Motion to Compel
Schedule Amendment and Affidavit of Randall L. Seaver***

to be filed electronically with the Clerk of Court through ECF, and that the above documents will be delivered by automatic e-mail notification pursuant to ECF and this constitutes service or notice pursuant to Local Rule 9006-1(a).

/e/ Stephanie Wood

Dated: October 6, 2009

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